

Suffolk County Sheriff's Department

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April 29, 2005

Frank Davis Chief Division Counsel Federal Bureau of Investigation One Center Plaza Boston, MA 02108

RE: Request For Information Pursuant to 28 C.F.R. §16.22
Wiring of Suffolk County House Of Correction Inmate
Rene Rosario And Cooperation of and Information Received From
Sheila Porter, R.N. Regarding the Suffolk County Sheriff's
Department

Dear Attorney Davis:

I represent Suffolk County Sheriff Andrea J. Cabral, Suffolk County Sheriff's Department and Suffolk County in a lawsuit filed by Sheila Porter which is currently pending before the Honorable Douglas Woodlock in the United States District Court, Porter v. Cabral, et al., No. 04-11935-DPW. In her complaint Ms. Porter alleges that, at the request of the FBI, she began providing information to the FBI beginning in 1999 and continued to do so through June 2003. She further alleges that, at the request of the FBI, she placed a recording device on an inmate, Rene Rosario, while he was incarcerated at the HOC in or around November 2002. Additionally, Ms. Porter has identified FBI agents Maurcen Robinson and Christa Snyder as having knowledge about her cooperation with the FBI.

Please accept this correspondence as a formal request for the release of any and all information related to the placing of a wire or recording device on Suffolk County House of Correction (HOC) inmate Rene Rosario, DOB 4/15/72, in or about November 2002 while he was incarcerated at the Suffolk County House of Correction. I am also requesting any and all information regarding the cooperation of and information received from Sheila Porter, R.N., a former contract nurse working at the Suffolk County House of Correction, regarding Inmate Rene Rosario and the Suffolk County House of Correction. Finally, I am seeking to depose two FBI agents, Maureen Robinson and Christa Snyder, regarding their knowledge of Sheila Porter's cooperation with the FBI, including the wiring of Rene Rosario.

I am making this request pursuant to 18 C.F.R. 16.22(c) and (d). I expect the information and testimony of the agents regarding Ms. Porter's cooperation with the FBI and the wiring of Inmate Rene Rosario to be relevant to the defense of this lawsuit as Ms. Porter alleges that she was unlawfully barred from the HOC because she provided information to the FBI.

I am requesting any and all information in the possession of the Bureau with regard to Ms. Porter's cooperation with the FBI from 1999 to date and the placing of a recording device on HOC inmate Rene Rosario in or about November 2002, including all persons who participated in or had knowledge of the wiring of inmate Rosario.

The Court has ordered that all discovery be completed by May 31, 2005. Therefore I am asking that this request be expedited. Please advise if any addition information is required or if you have any questions. I look forward to speaking with you. Thank you for your consideration.

Very truly yours,

Ellen M. Caulo

Deputy General Counsel

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